UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| KLEIMAR, N.V., Plaintiff, | ECF CASE |
| against | 16 CV 9486 (AJN) (DCF) |
| DALIAN DONGZHAN GROUP CO., LTD. BENXI BEIYING IRON AND STEEL GROUP IMPORT AND EXPORT CORP. LTD., BEIGANG HONG KONG LIMITED, and BEITAI IRON & STEEL GROUP CO., LTD., Defendants. | **ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO FORTY SIXTH THROUGH FIFTY EIGHTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V.** |

TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime Attachment and Garnishment in the above-captioned matter dated January 9, 2017, and served upon Garnishee MACSTEEL INTERNATIONAL USA CORP. ("MACSTEEL") on or about April 19, 2017, April 20, 2017, April 21, 2017, April 24, 2017, April 25, 2017, April 26, 2017, April 27, 2017, April 28, 2017, May 1, 2017, May 2, 2017, May 3, 2017, May 4, 2017, and May 5, 2017 respectively, Garnishee MACSTEEL hereby states that on each such date of service, it was not indebted to the Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI BEIYING IRON AND STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG HONG KONG LIMITED, or BEITAI IRON & STEEL GROUP CO., LTD (collectively, "Defendants"), and did not otherwise have in its possession any property, tangible or intangible, including funds, assets, cash, good, chattels, credits, effects, debts, owed by or owed to the

Defendant(s) or monies to be paid to discharge a debt owed to the Defendant(s), including monies being transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York
May 5, 2017

DLA PIPER LLP (US)

By: *__/s/ Neal Kronley__*

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*Attorneys for Garnishee*
*Macsteel International USA Corp.*

## VERIFICATION

STATE OF NEW YORK )<br>
) ss:<br>
COUNTY OF NEW YORK )

Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO FORTY SIXTH THROUGH FIFTY EIGHTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.

Margo Rosner Marks

Sworn to before me on<br>
May 5, 2017

Notary Public

DINETAH FAITH SI...<br>
Notary Public, State of New ...<br>
No. 02SI6346238<br>
Qualified In Westchester County<br>
Commission Expires August 8, 2020

**CERTIFICATE OF SERVICE**

I, Neal Kronley, hereby certify that on the 5 day of May, 2017, I caused the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO FORTY SIXTH THROUGH FIFTY EIGHTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. to be served by ECF upon:

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*Counsel for Plaintiff*

*/s/ Neal Kronley*
Neal F. Kronley